



Department of Energy
 Yucca Mountain Site Characterization
 Project Office
 P. O. Box 98608
 Las Vegas, NV 89193-8608

WBS 1.2.9.3
 QA

MAY 08 1991

Robert F. Pritchett
 Technical Project Officer
 for Yucca Mountain
 Site Characterization Project
 Reynolds Electrical &
 Engineering Co., Inc.
 P.O. Box 98521
 Las Vegas, NV 89193-8521

EVALUATION OF AMENDED RESPONSES TO CORRECTIVE ACTION REQUESTS (CARS)
 YM-91-026, YM-91-037, AND YM-91-038 RESULTING FROM YUCCA MOUNTAIN QUALITY
 ASSURANCE DIVISION (YMQAD) AUDIT YMP 91-02 OF REYNOLDS ELECTRICAL &
 ENGINEERING CO., INC.

The YMQAD staff has evaluated the amended responses to CARS YM-91-026,
 YM-91-037, and YM-91-038. The responses have been determined to be
 satisfactory. Verification of completion of the corrective actions will
 be performed after the effective dates provided. Any extension to these
 dates must be requested in writing with appropriate justification prior
 to the date. Please send a copy of extension requests to Nita J. Brogan,
 Science Applications International Corporation, Las Vegas, Nevada.

If you have any questions, please contact either Catherine E. Hampton at
 794-7973 or Mario R. Diaz at 794-7974.

Catherine Hampton
 Donald G. Horton, Director
 Yucca Mountain Quality Assurance Division

YMQAD:CEH-3534

Enclosure:
 CARS YM-91-026, YM-91-037,
 and YM-91-038

cc w/encl:
 K. R. Hooks, NRC, Washington, DC
 S. W. Zimmerman, NWPO, Carson City, NV
 W. J. Glasser, REECo, Las Vegas, NV
 N. J. Brogan, SAIC, Las Vegas, NV, 517/T-08

cc w/o encl:
 J. W. Gilray, NRC, Las Vegas, NV

YMP-5

9105150089 910508
 PDR WASTE
 WM-11 PDR

FULL TEXT ASCII SCAN
 add: K.R. Hooks

102.7
 W/m-11
 NH03

ORIGINAL
THIS IS A RED STAMP

**OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.**

14CAR NO.: YM-91-026
DATE: 03/07/91
SHEET: 1 OF 2
QA
WBS No.: 1.2.9.3

CORRECTIVE ACTION REQUEST

1 Controlling Document
QP 2.4

2 Related Report No.
AUDIT NO. 91-02

3 Responsible Organization
REECo, Logistic Support Dept.

4 Discussed With
S. Straub, C. Barker

10 Response Due
30 Days After Issue

11 Responsibility for Corrective Action
R. F. Pritchett

12 Stop Work Order Y or N
No

5 Requirement:

QP 2.4, Rev. 1, Para. 7.1 states, "Records of Personnel Qualifications, Indoctrination, Training, and Proficiency Evaluations shall be retained as lifetime QA Records and shall be maintained and processed in accordance with QP 17.0."

QP 17.0, Rev. 4, Paras. 5.4 and 5.4.5 state, "Each organization generating records is responsible for the control, authentication and distribution of its own records, including transmitting the original, or best available copy to the LRC for processing."

6 Adverse Condition:

Records of Personnel Qualification Evaluations, Indoctrination, Training, and Proficiency Evaluations have not been transmitted to the LRC for processing.

7 Recommended Action(s):

Identify the remedial action(s) to be taken to correct the deficiencies noted in Block 6. Investigate the program process, activities or documentation to determine the extent and depth of similar deficient conditions on the CAR. Identify these deficiencies and provide the

8 Initiator
M. R. Diaz
Mario Diaz

Date:
02/26/91

9 Severity Level -
1 2 3

13 Approved By:

Date:

OQA *Edwards Hupte* 3-8-91

15 Verification of Corrective Action:

16 Corrective Action Completed and Accepted:

OAR _____ Date _____

17 Closure Approved By:

OQA _____

ENCLOSURE

**OFFICE OF CIVILIAN
RADIOACTIVE WASTE MANAGEMENT
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WASHINGTON, D.C.**

CAR NO.: YM-91-026
DATE: 03/07/91
SHEET: 2 OF 2

**CORRECTIVE ACTION REQUEST
(continuation sheet)**

7 Recommended Action(s) (continued)

measures required to correct them. Identify the cause of the condition and the planned corrective action to prevent recurrence.

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| | |
|---------|-----------|
| CAR NO. | YM-91-026 |
| DATE: | 04-12-91 |
| SHEET: | 1 OF 1 |

CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-026

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

A. Extent of Deficiency:

It is acknowledged that the deficiency exists with all Personnel Qualification Evaluation, Indoctrination, Training and Proficiency Evaluation records.

B. Root Cause:

It was not clearly understood that the provisions of the Privacy Act of 1974 had been changed to allow training records to be processed by the Local Records Center (LRC).

C. Remedial Actions: (All Actions To Be Completed By 10-27-91)

A recent evaluation by REECO has clarified the acceptability of submitting the training records to the LRC. All training records will be processed in accordance with the provisions of the Privacy Act, DOE-80, Quality Assurance Training and Qualification Records. This will be the final action to be taken in our updating of training records.

D. Corrective Action to Prevent Recurrence:

Everyone involved with processing training records to the LRC has been given written guidance by the Logistical Support Department Manager as to the contents of the provision of Privacy Act, DOE-80. All new personnel will be given the same guidance.

This response was amended on AP 23, 91 4/24/91

Response Approved: *Bruce Ardella For R.F.P.* 4/12/91
Responsible Manager Date

RESPONSE ACCEPTED: _____ Date
OAR

RESPONSE ACCEPTED: _____ Date
OQA

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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

CAR NO. YM-91-026

DATE: 04-22-91

SHEET: 1 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-026

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

A. Extent of Deficiency:

It is acknowledged that the deficiency exists with all Personnel Qualification Evaluation, Indoctrination, Training and Proficiency Evaluation records.

B. Root Cause:

It was not clearly understood that the provisions of the Privacy Act of 1974 had been changed to allow training records to be processed by the Local Records Center (LRC).

C. Remedial Actions: (All Actions To Be Completed By 10-27-91)

A recent evaluation by REECO has clarified the acceptability of submitting the training records to the LRC. All training records will be processed in accordance with the provisions of the Privacy Act, DOE-80, Quality Assurance Training and Qualification Records. This will be the final action to be taken in our updating of training records as follows:

1. The intermediate steps will include having all records updated and provided to the training administrator by July 12, 1991.
2. The verification process will be accomplished, and the records of those individuals performing quality affecting activities will be forwarded to the LRC by July 26, 1991.
3. The records of those not currently performing quality affecting activities will be verified and transmitted to the LRC by October 27, 1991.

ltd dtd 4/23/91 - 580-01-377

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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

CAR NO. YM-91-025
DATE: 04-22-91
SHEET: 2 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

D. Corrective Action to Prevent Recurrence:

Everyone involved with processing training records to the LRC has been given written guidance by the Logistical Support Department Manager as to the contents of the provision of Privacy Act, DOE-80. All new personnel will be given the same guidance.

Response Approved: 127 Kitchert 4/23/91
Responsible Manager Date

RESPONSE ACCEPTED: Chris Lee 4/24/91
QAR Date

RESPONSE ACCEPTED: Catherine F. Langstaff 4-26-91
OGA Date

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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

CAR NO.: YM-91-037
DATE: 03/07/91
SHEET: 2 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

5 Requirements (continued)
record package."

6 Adverse Condition (continued)

have not been transmitted as a QA record package.

3. Audit REEC0-004-90, report was issued on May 29, 1990 and the last finding was closed on July 7, 1990. However, it was transmitted to the LRC on November 7, 1990.

4. Audit REEC0-005-90, report was issued on June 6, 1990 and the last finding was closed on June 26, 1990. However, it was transmitted to the LRC on November 7, 1990.

7 Recommended Action(s) (continued)

measures required to correct them. Identify the cause of the condition and the planned corrective action to prevent recurrence.

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CAR NO. YM-91-037
DATE: 04-12-91
SHEET: 1 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-037

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

A. Extent of Deficiency:

- o A sample review of record packages was performed and determined that many record packages may be missing from the Local Record Center (LRC).
- o For those record packages currently in the LRC, many were not submitted in accordance with the 10-day turnover requirement.

B. Root Cause:

Record Sources have not complied with the records requirements described in the governing procedures as evidenced by their failure to implement the classroom training and guidelines provided.

C. Remedial Actions: (All Actions To Be Completed By 10/15/91)

1. A review will be conducted to determine how many record packages should have been generated by Quality and Implementing Procedures. Once a list is determined, a comparison will be made to those record packages contained in the records system. If packages are missing, the Records Source will be requested to obtain and transmit it to the LRC. If a complete records package can not be assembled, documentation will be issued and included in the package acknowledging the missing documentation. An evaluation of the affect on quality of the missing documentation will be performed and included as part of the records package. The above actions will be coordinated by the LRC.
2. The completed 1990 Management Assessment was submitted to the LRC on 04/08/91.
3. The Readiness Review for Midway Valley activities will be submitted to the LRC by 05/15/91.
4. For those records that were submitted after the 10-day turnover requirement, no remedial actions can be taken.

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WASHINGTON, D.C.

CAR NO. YM-91-037
DATE: 04-12-91
SHEET: 2 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-037 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

D. Corrective Action to Prevent Recurrence: (Actions To Be Completed By 05/31/91)

1. QPs 5.1 and 5.3 will be revised to distribute Quality and Implementing Procedures to the LRC as part of the mandatory review. This will ensure that the LRC is aware of what records or record packages will be generated by that procedure. The revisions will be completed by 05/31/91.
2. Notification will be made to all YMP support departments identifying the records management deficiencies observed during the DOE audit of the REECO Yucca Mountain Project. Managers will be cautioned to notify their Record Sources and Administrators of the importance of record generation and submittal of completed records/record packages within the 10-day turnover timeframe. This notification will be completed by 05/31/91.
3. Additional support and direction is being provided by the LRC Staff to Records Sources and Administrators through on-site visits, on-the-job training, menu-driven submittal programs and appropriate user's manuals. This is an on-going activity.

Response Approved: Bruce Mandella For R.F.P. 4/12/91
Responsible Manager Date

ACCEPT RESPONSE: _____
QAR Date

ACCEPT RESPONSE: _____
OQA Date

This response was amended on AP 23, 91 PD 4/24/91

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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

CAR NO. YM-91-037
DATE: 04-23-91
SHEET: 1 OF 3

CORRECTIVE ACTION REQUEST
(continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-037

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

A. Extent of Deficiency:

- o A sample review of record packages was performed and determined that many record packages may be missing from the Local Record Center (LRC).
- o For those record packages currently in the LRC, many were not submitted in accordance with the 10-day turnover requirement.

B. Root Cause:

Record Sources have not complied with the records requirements described in the governing procedures as evidenced by their failure to implement the classroom training and guidelines provided.

C. Remedial Actions: (All Actions To Be Completed By 10/15/91)

1. A review will be conducted to determine how many record packages should have been generated by Quality and Implementing Procedures. This review will be conducted by May 30, 1991 and will identify those packages (current revision level) which represent current activities.
2. Once a list of packages has been determined, a comparison will be made to those record packages contained in the records system. This review will be conducted by 6/15/91.
3. If packages for current activities are found missing, the Records source will be requested by 7/1/91 to obtain and transmit the required records to the LRC. If a complete records package can not be assembled, documentation will be issued and included in the package acknowledging the missing documentation. An evaluation of the affect on quality of the missing documentation will be performed and included as part of the records package. All activities associated with current activity packages will be completed by 8/1/91.

Str dtd 4/23/91 - 580-01-377

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CAR NO. YM-91-037
DATE: 04-23-91
SHEET: 2 OF 3

CORRECTIVE ACTION REQUEST
(continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-037 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

C. Remedial Actions: (Continued)

4. For all other missing packages (not current activity), the Records Source will be requested by 8/1/91 to obtain and transmit the required records to the LRC if the missing information represents package data for an activity which will not be repeated or for procedures which will be used in the future. If a complete records package can not be assembled, documentation will be issued and included in the package acknowledging the missing documentation. An evaluation of the affect on quality of the missing documentation will be performed and included as part of the records package. All activities associated with current activity packages will be completed by 10/15/91
5. The completed 1990 Management Assessment was submitted to the LRC on 04/08/91.
6. The Readiness Review for Midway Valley activities will be submitted to the LRC by 05/15/91.
7. For those records that were submitted after the 10-day turnover requirement, no remedial actions can be taken.

D. Corrective Action to Prevent Recurrence: (Actions To Be Completed By 05/31/91)

1. QPs 5.1 and 5.3 will be revised to distribute Quality and Implementing Procedures to the LRC as part of the mandatory review. This will ensure that the LRC is aware of what records or record packages will be generated by that procedure. The revisions will be completed by 05/31/91.

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CAR NO. YM-91-037
DATE: 04-23-91
SHEET: 3 OF 3

CORRECTIVE ACTION REQUEST
(continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-037 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

D. Corrective Action to Prevent Recurrence: (Continued)

2. Notification will be made to all YMP support departments identifying the records management deficiencies observed during the DOE audit of the REECO Yucca Mountain Project. Managers will be cautioned to notify their Record Sources and Administrators of the importance of record generation and submittal of completed records/record packages within the 10-day turnover timeframe. This notification will be completed by 05/31/91.
3. Additional support and direction is being provided by the LRC Staff to Records Sources and Administrators through on-site visits, on-the-job training, menu-driven submittal programs and appropriate user's manuals. This is an on-going activity.

Response Approved: 127 Pritchett 4-23-91
Responsible Manager Date

RESPONSE ACCEPTED: David Lee 4-24-91
QAR Date

RESPONSE ACCEPTED: Anthony Hampton for 4-26-91
OQA Date

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14 CAR NO.: YMP-91-038
DATE: 3/7/91
SHEET: 1 OF 2
QA
WBS No.: 1.2.9.3

CORRECTIVE ACTION REQUEST

1 Controlling Document
QP 17.0

2 Related Report No.
Audit 91-02

3 Responsible Organization
REECo

4 Discussed With
C. Thompson/R. Pritchett/M. Fox

10 Response Due
30 days after issue

11 Responsibility for Corrective Action
R.F. Pritchett

12 Stop Work Order Y or N
N

5 Requirement:

QP 17.0, Revision 4, Paragraph 6.1.3.1 states, "Documents designated as records shall be completed and processed in accordance with this procedure and the REECo/YMP approved Records Management procedure."

IM-LRC-IP-01, Revision 0, Paragraph 6.1.1.12 and 6.1.1.12.1 state, "Prior to transmittal to the LRC, records shall be reviewed to ensure the record is complete and all of its attachments or enclosures are included."

QAPP, Revision 8, Section XVII, Paragraph 1.1 states in part, "Quality Assurance Records include (1) individual documents that have been executed, completed, and approved and that furnish evidence of the...activities affecting quality; (2) documents prepared and maintained to demonstrate implementation of quality assurance programs. A completed record is a (Con't)

6 Adverse Condition:

Documents maintained as records are incomplete and do not contain all of the records generated by the implementation of the applicable procedures. Examples are:

1. Management Assessment for year 1990: Completed checklists and Corrective Action Requests are missing (Reference QP 2.3, Revision 1, Paragraph 7.1)
2. QP, IP, QS, Calibration, and Welding procedures: Document Review Record, Document Review Continuation Sheets, and Quality Procedure Change Notices are missing (Reference QP 5.1, Revision 2, Paragraph 7.1)

7 Recommended Action(s):

Identify the remedial action(s) to be taken to correct the deficiencies noted in Block 6. Investigate the program process, activities or documentation to determine the extent and depth of similar deficient conditions of the CAR. (Con't)

8 Initiator
Mardo R. Diaz
Mardo R. Diaz

Date: 2/28/91

9 Severity Level -
1 2 3

13 Approved By:
OOA *[Signature]*

Date: 3/11/91

15 Verification of Corrective Action:

16 Corrective Action Completed and Accepted:
QAR _____ Date _____

17 Closure Approved By:
OOA _____

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WASHINGTON, D.C.

RKK 2/12/91
CAR NO.: YM-91-038
DATE: 3/7/91
SHEET: 2 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

5 Requirements (continued)

document that will either receive no more entries or whose revision would normally consist of the reissue of the document; and is signed and dated by the originator and, as applicable, by personnel authorized to approve the document."

QP 2.3, Revision 1, paragraph 7.1 states, "The completed Management Assessment Report, Checklist, Memorandum, and Corrective Action Requests shall be considered QA Records, and shall be maintained in accordance with QP 17.0."

QP 5.1, Revision 2, paragraph 7.1 states, "Procedures and their revisions, Document Review Record, Document Review Record Continuation Sheets, and the Quality Procedure Change Notices, when applicable, generated by the implementation of this procedure are QA Records and shall be packaged together and processed in accordance with QP 17.0."

7 Recommended Action(s) (continued)

Identify these deficiencies and provide the measures required to correct them. Identify the cause of the condition and the planned corrective action to prevent recurrence.

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U.S. DEPARTMENT OF ENERGY
WASHINGTON, D.C.

CAR NO. YM-91-038
DATE: 04-12-91
SHEET: 1 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-038

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

A. Extent of Deficiency:

Based on a sample review, it appears that many of the record packages submitted may be deficient in their required documentation.

B. Root Cause:

Record Sources have not complied with the records requirements described in the governing procedures as evidenced by their failure to implement the classroom training and guidelines provided.

C. Remedial Actions: (All Actions To Be Completed By 10/15/91)

1. The submitted Record Packages will be examined by the Record Source and Local Records Center (LRC) Staff to determine what documents, as required by the governing procedure, were included in the packages. If documentation is missing, the Records Source will attempt to obtain and include it in the package. Otherwise documentation will be issued and included in the package acknowledging the missing documentation. An evaluation of the affect on quality of the missing documentation will be performed and included as part of the records package.
2. The completed 1990 Management Assessment was submitted to the LRC on 04/08/91.

D. Corrective Action to Prevent Recurrence: (Actions To Be Completed By 05/31/91)

1. QPs 5.1 and 5.3 will be revised to distribute procedures to the LRC as part of the mandatory review. This will ensure that the LRC is aware of what records or record packages will be generated by that procedure. These revisions will be completed by 05/31/91.

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CAR NO. YM-91-038
DATE: 04-12-91
SHEET: 2 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

CORRECTIVE ACTION RESPONSE: CAR YM-91-038 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL (Continued)

D. Corrective Action to Prevent Recurrence: (Continued)

2. Notification will be made to all YMP support departments identifying the records management deficiencies observed during the DOE audit of the REECO Yucca Mountain Project. Managers will be cautioned to notify their Record Sources and Administrators of the importance of record generation and submittal of completed records/record packages within the 10-day turnover timeframe. This notification will be completed by 05/31/91.
3. Additional support and direction is being provided by the LRC Staff to Records Sources and Administrators through on-site visits, on-the-job training, menu-driven submittal programs and appropriate user's manuals. This is an on-going activity.

Response Approved: Bruce Handell For RFP 4/12/91
Responsible Manager Date

RESPONSE ACCEPTED: [Signature] * _____
QAR Date

RESPONSE ACCEPTED: _____
OQA Date

* This response was amended on AP 23, 91
MS 4/24/91

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RADIOACTIVE WASTE MANAGEMENT
U.S. DEPARTMENT OF ENERGY
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CAR NO. YM-91-038
DATE: 04-23-91
SHEET: 1 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-038

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL

A. Extent of Deficiency:

Based on a sample review, it appears that many of the record packages submitted may be deficient in their required documentation.

B. Root Cause:

Record Sources have not complied with the records requirements described in the governing procedures as evidenced by their failure to implement the classroom training and guidelines provided.

C. Remedial Actions: (All Actions To Be Completed By 10/15/91)

1. Using the list of packages generated as part of the remedial actions for CAR-YM-91-037, item C 1, those packages which represent current activities which are currently in the LRC will be reviewed by Quality Assurance and the LRC staff to determine the completeness of the records submitted in accordance with the governing procedure. This review will be completed by 6/15/91.
2. If documentation is found missing for current activities, Quality Assurance will conduct an evaluation of the affect on quality of the missing documentation and included as part of the package by 7/1/91.
3. If the missing documentation is deemed to be critical to the satisfactory performance of quality affecting activities for the licensing of the repository, then the Records source will be requested to provide the missing information to the LRC no later than 8/1/91.
4. For all other packages which are not representative of current activities, the review for package completeness and affect on quality determination for missing documentation will be completed by 10/15/91.
5. The completed 1990 Management Assessment was submitted to the LRC on 04/08/91.

Lta dtd 4/23/91 - 580-01-377

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CAR NO. YM-91-038
DATE: 04-23-91
SHEET: 2 OF 2

CORRECTIVE ACTION REQUEST
(continuation sheet)

AMENDED RESPONSE

CORRECTIVE ACTION RESPONSE: CAR YM-91-038 (Continued)

1. CORRECTIVE ACTION FOR DEFICIENT CONDITION # ALL (Continued)

D. Corrective Action to Prevent Recurrence: (Actions To Be Completed By 05/31/91)

1. QPs 5.1 and 5.3 will be revised to distribute procedures to the LRC as part of the mandatory review. This will ensure that the LRC is aware of what records or record packages will be generated by that procedure. These revisions will be completed by 05/31/91.
2. Notification will be made to all YMP support departments identifying the records management deficiencies observed during the DOE audit of the REECo Yucca Mountain Project. Managers will be cautioned to notify their Record Sources and Administrators of the importance of record generation and submittal of completed records/record packages within the 10-day turnover timeframe. This notification will be completed by 05/31/91.
3. Additional support and direction is being provided by the LRC Staff to Records Sources and Administrators through on-site visits, on-the-job training, menu-driven submittal programs and appropriate user's manuals. This is an on-going activity.

Response Approved: 127 Pritchett 4/23/91
Responsible Manager Date

RESPONSE ACCEPTED: Hais 4/24/91
QAR Date

RESPONSE ACCEPTED: Catherine Hampton 4-21-91
QQA Date